

FILED
JAMES BONINI
CLERK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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UNITED STATES OF AMERICA
Plaintiff,

:

Case NO. CR-1-02-054
Honorable Bunning
"Judge"

-VS-

EXPERT WITNESS MOTION

WALTER M. PUGH, JR.
Defendant.

Now comes defendant, Walter M. Pugh, Jr., pro-se for good cause.

Defendant contends that he was not giving the opportunity to consult with his attorney concerning the expert witness to testify, due to his attorney was not available; therefore after some legal research, consulting with another attorney, and giving consideration to the facts, defendant contends that the expert witness is necessary; regardless of the government's contention.

Defendant contends that Bessie Pew's identification as to "look like my brother" will need to be explained to the jury by an expert witness, because Bessie clearly stated that she was up set at the time detectives question her.

Defendant contends that denying him of this witness, will be denying him of his constitutional right.

Respectfully submitted,


Walter M. Pugh, Jr.

CERTIFICATE OF SERVICE

By ordinary U.S. mail, on this 28th day of October, I hereby certify that a copy of the following was served upon, Amul Thapar, Asst. U.S. Attorney, Atrium II, suite 400, 221 E. 4th street, Cincinnati, Ohio, 45202, Jay Clark, 114 E. 8th Street, suite 400, Cincinnati, Ohio, 45202, and William Gallagher, 114 East 8th street, Cincinnati, Ohio, 45202.



**Walter M. Pugh, Jr.
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